

Richard E. Leff, Esq. (RL-2123)  
McGIVNEY & KLUGER, P.C.  
80 Broad Street, 23<sup>rd</sup> Floor  
New York, New York 10004  
(212) 509-3456

Attorneys for Defendants:  
LEHMAN BROTHERS INC., LEHMAN  
COMMERCIAL PAPER INC. and LEHMAN  
BROTHERS HOLDINGS INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X 21 MC 102 (AKH)

ENILDA SANTANA,

Index No.: 08-CV-01637

Plaintiff(s),

**NOTICE OF ADOPTION OF ANSWER  
TO MASTER COMPLAINT**

-against-

**ELECTRONICALLY FILED**

DEUTSCHE BANK TRUST COMPANY  
AMERICAS, *et al.*,

Defendant(s).

-----X

PLEASE TAKE NOTICE that Defendants, LEHMAN BROTHERS INC., LEHMAN COMMERCIAL PAPER INC. and LEHMAN BROTHERS HOLDINGS INC., by their attorneys, McGIVNEY & KLUGER, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated August 10, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendants, LEHMAN BROTHERS INC., LEHMAN COMMERCIAL PAPER INC. and LEHMAN BROTHERS HOLDINGS INC., by their attorneys, McGIVNEY & KLUGER, P.C., demand judgment dismissing the above-captioned

action as against them, together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
June 12, 2008

Yours etc.,

McGIVNEY & KLUGER, P.C.  
Attorneys for Defendants  
LEHMAN BROTHERS INC., LEHMAN  
COMMERCIAL PAPER INC. and LEHMAN  
BROTHERS HOLDINGS INC.

By: 

Richard E. Leff (RL-2123)  
80 Broad Street, 23<sup>rd</sup> Floor  
New York, New York 10004  
(212) 509-3456

TO: OSHMAN & MIRISOLA, LLP  
Plaintiffs Liaison  
In Re Lower Manhattan Disaster Site  
Litigation  
Attn: David L. Kremen  
42 Broadway, 10th Floor  
New York, New York 10004  
(212) 233-2100

All Defense Counsel